

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>In re:</b>	:	
	:	<b>Case No.: 18-61773</b>
<b>Johntory Reese</b>	:	<b>Chapter 13</b>
<b>Janice Kay Reese</b>	:	<b>Judge Russ Kendig</b>
	:	*****
<b>Debtor(s).</b>	:	

**OBJECTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF  
STANWICH MORTGAGE LOAN TRUST F TO MODIFICATION OF THE  
CONFIRMED PLAN (DOCKET NUMBER 107)**

Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust F ("Creditor"), by and through its mortgage servicing agent Carrington Mortgage Services, by and through its undersigned counsel, objects to the currently proposed Modification of Chapter 13 Plan ("Plan") filed by Johntory Reese and Janice Kay Reese (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 78 S Trimble Rd., Mansfield, OH 44906 ("Property").
2. Creditor is the transferee of Proof of Claim number 13 in the amount of \$84,639.89. This amount includes a pre-petition arrearage in the amount of \$3,361.75.
3. Creditor objects to Debtor's Plan to the extent that it fails to account for the conduit mortgage payments to Creditor during the proposed period of suspended plan payments.
4. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim.

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WHEREFORE, Creditor respectfully requests that the Court deny the Debtor's currently proposed Modification of the Plan.

Respectfully submitted,

/s/Stephen R. Franks

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Attorneys for Creditor

The case attorney for this file is Stephen R. Franks.

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### **CERTIFICATE OF SERVICE**

This is to certify that on August 21, 2020, a true and accurate copy of the foregoing Objection of Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust F to the Modification of Confirmed Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Dynele L Schinker-Kuharich, Chapter 13 Trustee, dlsk@Chapter13Canton.com

Giancarlo Variola, Attorney for Johntory Reese and Janice Kay Reese,  
capleavariola@yahoo.com

and on the below listed parties by regular U.S. mail, postage prepaid:

Johntory Reese, 78 S Trimble Road, Mansfield, OH 44906

Janice Kay Reese, 78 S. Trimble Road, Mansfield, OH 44906

Johntory Reese and Janice Kay Reese, 78 S Trimble Rd, Mansfield, OH 44906

Richland County Treasurer, 50 Park Avenue East, Mansfield , OH 44902

/s/Stephen R. Franks

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